

CRUMMY, DEL DEO, DOLAN, GRIFFINGER & VECCHIONE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

ONE RIVERFRONT PLAZA

NEWARK, N.J. 07102-5497

201-596-4500

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138154

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201-596-0345

262431

October 11, 1996

VIA FACSIMILE AND UPS NEXT BUSINESS DAY DELIVERY

Carl Howard, Esq.
Assistant Regional Counsel of New Jersey
Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
Region II
290 Broadway
New York, New York 10007-1866

**Re: United States Avenue Burn Site Gibbsboro
Camden, New Jersey
Response to the Request for Information**

Dear Mr. Howard:

This letter, on behalf of The Sherwin-Williams Company ("Sherwin-Williams"), is in response to the Request for Additional Information dated September 6, 1996 ("Supplemental Request") from the United States Environmental Protection Agency ("EPA") regarding the United States Avenue Burn Site ("Site").

Sherwin-Williams previously responded to EPA's August 24, 1995 Information Request ("Initial Request") regarding the same Site by response dated October 30, 1995. Sherwin-Williams conducted a diligent search in response to this request and made numerous company

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files available to EPA for review at the offices of Crummy, Del Deo, Dolan, Griffinger & Vecchione. The information made available to EPA included deposition transcripts of current and former employees regarding the operations at the Plant. These employees included: Gordon S. Kuntz, Robert Tschannen, Robert DuLaney (Vol. 1 and 2), William Taylor, Robert Burke, Jack Whiteside, Albert Gosa, Jerry Fiamingo, Robert Henderson and Al Dutill. The company also produced documents in response to the Initial Request, including the Site investigation done by DEP, maps produced by Scarborough in the Scarborough Litigation, Raw Materials Consumption Reports, production documentation from 1973 - 1976, documentation relative to the 1950s and disposal practices, and reports filed by Roy F. Weston, Inc. relative to the Burn Site. Sherwin-Williams inadvertently omitted a Certification to the 1995 response, and will provide a certification to the response.

With respect to the information contained in the October 30, 1995 response, including the documents made available to the EPA for review, Sherwin-Williams made a detailed response to the Initial Request based on the information it had available to it. The Supplemental Request for Information dated September 6, 1996 requests additional information which was not requested in the August 24, 1995 Initial Information Request. Sherwin-Williams has been working diligently to prepare this response.

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Sherwin-Williams has requested additional time to respond to the Supplemental Request, and plans to supplement this response by October 28, 1996. Sherwin-Williams provides its responses, numbered as requested by the Supplemental Request:

Responses to Supplemental Request for Information

1. EPA commented that "several Weston Reports state, '... in 1930 John Lucas and Co. merged with Sherwin-Williams of Cleveland, Ohio.' This is in contradiction with information provided to EPA by Sherwin-Williams in your October 30, 1995 response to the August 24, 1995 United States Avenue Burn Site Request for Information."

The Initial Request for information did not ask any specific questions about the legal relationship or merger between the former John Lucas Company and The Sherwin-Williams Company. Accordingly, Sherwin-Williams did not provide any information on the merger. Sherwin-Williams Consultant, Roy F. Weston, produced numerous reports in connection with investigative and remedial activities at the former Gibbsboro Plant. The purpose of these reports was to outline proposed sampling and report the results. They do not constitute a legal position on corporate transactions. Sherwin-Williams does not know what is referred to by EPA's comment regarding "other historical information available to EPA and the NJDEP" or discussions with unnamed "former employees and residents in the neighborhood surrounding the former Plant." It is unlikely that either former employees or residents in the neighborhood would have accurate information regarding a corporate legal transaction such as a merger.

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In response to the Supplemental Request for specific information regarding the relationship between the John Lucas Company and Sherwin-Williams, Sherwin-Williams provides the following information. It is believed that the plant business was originally conducted under the name of John Lucas and Company (unincorporated). In or about April 16, 1909, the assets of the unincorporated company were sold to John Lucas & Co., Inc., a corporation organized under the laws of the State of Pennsylvania.

Pursuant to an agreement dated December 24, 1929 between The Sherwin-Williams Company, an Ohio Corporation, and John Lucas & Co., Inc., a Pennsylvania corporation, it appears that The Sherwin-Williams Company created a new corporation incorporated under the laws of Delaware known as John Lucas & Co., Inc. It appears that from 1930 to 1935, John Lucas & Co., Inc., the Delaware corporation, was operated as a subsidiary of The Sherwin-Williams Company.

On or about August 14, 1935, a corporation known as John Lucas & Co., Inc., a Maryland Corporation, was formed. In accordance with a Certificate of Good Standing for The Sherwin-Williams Company from the State of Ohio, a Certificate of Agreement of Merger of John Lucas & Co., a Maryland Corporation, into the Sherwin-Williams Company, an Ohio corporation, was filed on August 28, 1967.

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2. EPA questions Sherwin-Williams October 30, 1995 response because it stated that "it was not able to identify detailed information on manufacturing processes at the Gibbsboro Plant through the 1940s."

Sherwin-Williams has interviewed numerous former employees and also made available to EPA depositions of its former employees that were taken in connection with the Buzby Brothers litigation. None of these former employees were employed prior to 1950. Sherwin-Williams is not aware of any employees or former employees with detailed knowledge of operations at the Gibbsboro Plant in the 1940s. EPA refers to discussions with former employees and residents in the neighborhoods surrounding the former Plant who purportedly provided such information. Sherwin-Williams would appreciate receiving from EPA the information EPA obtained about Plant operations from the 1930s to 1977.

EPA cites references to Gibbsboro operations in the 1930s included in one or more Weston reports. It is believed that information in the Weston reports was derived from a history dated August 1982, which was not prepared by Sherwin-Williams, but was privately prepared for Robert K. Scarborough, owner and developer of the Paint Works Corporate Center, Gibbsboro, New Jersey.

EPA states that it "considers the responses to the questions in the United States Burn Site Request for Information, with regard to John Lucas and Company and/or Sherwin-Williams past manufacturing and formulating operations, raw materials, products, and pigment formulations to

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be insufficient and believes that Sherwin-Williams has not been forthright in its response."

Sherwin-Williams conducted a detailed review in response to the Initial Request and provided narrative summaries describing the former plant operations. It should be noted that EPA's requests pertain to manufacturing operations at the Gibbsboro facility, which is not the site at issue. Nonetheless, Sherwin-Williams has provided the information it has been able to locate and will supplement this response if additional information is located.

EPA states "In Sherwin-Williams October 30, 1995 response, Allen Danzig referred EPA to documents at the Crummy, Del Deo, Dolan, Griffinger & Vecchione offices concerning the products manufactured at the Gibbsboro Plant from 1920 to when the company ceased operations." A review of Sherwin-Williams October 30, 1995 response does not reveal any representation that Sherwin-Williams had documents concerning products manufactured back to the 1920s. Sherwin-Williams provided what production information it had to EPA during the inspection on April 17, 1996. Unfortunately, Sherwin-Williams has only located production reports dating back to 1973, beyond the timeframe for any alleged activity by Sherwin-Williams regarding the Site. Sherwin-Williams is searching for information on the product codes for these reports and other responsive information, although the information is likely to be largely irrelevant. Sherwin-Williams has not identified any information suggesting that it disposed of product at the Burn Site.

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3. EPA comments that Sherwin-Williams was asked to provide detailed information on how hazardous substances were stored at the facility. EPA did not make such a request in its August 24, 1995 Initial Request for Information. While Sherwin-Williams is not clear which facility is referred to, it has not identified any information that hazardous substances were stored at the Burn Site.

The Supplemental Request asks Sherwin-Williams to describe in detail how and where chemicals at the plant were used. The depositions of former employees, which were provided to EPA for review, included information on materials used during the manufacture of products at the Plant. Specifically, Jerry Fiamingo, former Paint Superintendent, describes the process for manufacturing varnish. Messrs. Robert DuLaney, former Plant Engineer, Robert Lambert, former Mechanical Maintenance Foreman, James Gadwood, former Plant Manager, and Al Gosa, former Purchasing Manager describe generally the various manufacturing processes. In addition, a narrative description was provided in our response dated October 30, 1995.

Information on storage of various raw materials was contained in various depositions and also in a 1974 map that details the various raw materials storage tanks for liquid raw materials. Pigments, according to various depositions came in bags. See Fiamingo Deposition dated October 18, 1995, at p. 86.

Testimony regarding the company's policy and operating procedures for work off of scrap and off specification paints, lacquers and varnishes are included inter alia in the following

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depositions: Robert DuLaney, Albert Gosa, Robert Lambert and Jerry Fiamingo. These depositions also discuss barn paint, which was a cheap paint made up of off specification paints and paints that could not be re-worked. According to Mr. Fiamingo, this operation was conducted in the main Paint Building.

4. EPA states that Sherwin-Williams did not adequately respond to question 2 concerning the locations of specific operations and processes at the Gibbsboro Plant and specifically asks about Building 57 and Building 62. According to the depositions of Albert Gosa and William Taylor, Building 57 was used for the storage of raw materials. Clearly, this would be dry raw materials such as pigments, since liquid raw materials were stored in tank cars, tanks and 55 gallon drums for certain solvents for ease of use. Building 62 was used for the storage of finished goods including latex paint, pails and brushes (Gosa Dep. at 51-52). See also deposition of Robert Lambert.

Mr. Taylor, who worked in the Receiving Department, testified that formaldehyde was kept in storage tanks, acetone was kept in tanks or drums, linseed oil, latex and thinners were stored in tank wagons. According to Mr. Gosa and Mr. Lambert, Building 58 was a warehouse for finished products. None of the deponents was able to identify what, if anything, was stored in the 2,000 drums, triple-stacked that are referenced on the 1974 map.

With respect to the solvents that were used to supplement the fuel in the boiler in Building 37, both Mr. DuLaney and Mr. Gosa stated in depositions that solvent waste from the

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Paint Plant which could not be re-worked into the paint and scrap lacquer was burned in the boiler.

5. Regarding EPA's request on disposal of wastestreams by the Gibbsboro Plant, Sherwin-Williams has identified documents provided to EPA and testimony of ex-employees that indicates plant trash of all types was routinely burned at the Burn Site. Tank washouts from the latex system were disposed of in the sanitary waste system on Plant property.

EPA requests that Sherwin-Williams respond to specific paragraphs:

EPA has reason to believe that during the period in the 1950s and 1960s, but not limited to these years, sludge and/or residues were pumped from the boiler room in Building 37 into drums that went to Buzby's Landfill. Two settling tanks behind Building 37 reportedly generated sludges and/or residues.

Information from ex-employees, Mr. DuLaney and Mr. Gosa, indicates that the materials in the settling tanks were burned in the boiler system. Sherwin-Williams has no information that any residues from the settling tanks were placed into drums and sent to Buzby's Landfill during the 1950s and 1960s.

EPA states:

Building 37 is also reported to have contained a still which generated still bottoms. Provide an estimate of the quantity generated for each of these materials. Specifically state the location where these materials were disposed of.

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Sherwin-Williams has not been able to confirm the existence of a still or any quantities of materials generated outside Building 37. The testimony of Mr. Gosa and Mr. DuLaney suggest that the solvent wastes outside Building 37 were used to fuel the boiler.

EPA states:

The paint strainer machine in Building 39 generated solids that were reportedly placed into cardboard boxes and disposed of. Provide an estimate of the quantity generated for this materials. Specifically state the location where this material was disposed of.

Sherwin-Williams responds that Jerry Fiamingo, who was the Paint Superintendent from 1966 until the plant closed in 1978, states that the dried paint that resulted from straining latex paint was put in a cardboard box and generated less than one-half gallon of dried paint per batch. He believed that this latex dried paint was disposed of with regular plant trash. Fiamingo
Deposition at p. 99.

EPA states:

In the Lacquer and Paint Department what was the final disposition of waste thinners, solvents and scrap lacquers that could not be re-used or re-worked? Provide an estimate of the materials generated for each of these materials. Specifically state the location where these materials were disposed of.

Messrs. Gosa, DuLaney and Fiamingo testified that waste thinners, solvents and scrap lacquers that could not be re-used or re-worked were burned in the boiler behind Building 37.

EPA states:

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In the Sher-dye process provide an estimate of the quantity of material generated by the tank washes. Specifically state the location where this material was disposed of.

Sherwin-Williams responds that, according to deposition testimony of ex-employees, the tank washes from Sher-dye were disposed of in the on-site sanitary system. Sherwin-Williams cannot provide an estimate of this material. In addition, the accumulated material from the on-site sanitary system was removed to an approved off-site location pursuant to an Administrative Consent Order entered into in 1978 with NJDEP. Sherwin-Williams has not found documents regarding disposal practices prior to the 1950's.

6. EPA requests a discussion on the former tank farm on United States Avenue, including when it was first used, how long it was used and the materials and quantities that were stored in the tanks during their existence for both John Lucas Company and Sherwin-Williams operations.

The 1974 map indicates the location of the former tank farm and what materials were contained in each tank. Sherwin-Williams has not located information regarding what may have been contained in those tanks at earlier times.

7-12. With respect to Requests 7 through 12, Sherwin-Williams is still searching for responsive information and documents.

13. EPA claims Sherwin-Williams failed to provide the telephone numbers for the persons, specifically, DuLaney, Williams, Gosa, Burke, Taylor, Whiteside, Dutill, Gadwood and Lambert, listed in its response to EPA's Initial Request. In the directions provided in the Initial Request,

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telephone numbers were not requested for these individuals. Only instruction #7, that relates to "an individual other than one employed by your company," requests the phone number.

However, in response to this request, Sherwin-Williams provides the following information.

Robert DuLaney - (609)845-8126, Al Gosa - (216)543-5834, Robert Burke - (414)767-0447,
William Taylor - (609)783-6790, Al Whiteside - (609)784-1022, Alfred Dutill - (609)784-2536,
James Gadwood - (708)438-0528, Robert Lambert - (609)629-5668.

EPA also requests the years of employment of the above-listed persons. Each of these individuals was deposed in connection with the Buzby matter. Those depositions were provided to EPA and in each of those depositions, the individual testified as to his years of employment. Thus, the information was provided to EPA. However, Sherwin-Williams has reviewed those depositions and, based on the deposition testimony, provides the following information relating to their employment and positions:

Albert Gosa -	1963-1982 Head of Purchasing Dept. 1963-1976-Gibbsboro Assistant-Cleveland-Witness unable to estimate when he held position. Head of the purchasing department for all factories-Cleveland-1976-1982
Robert Lambert -	1966-1978-Gibbsboro Mechanical Maintenance Foreman.
Jack D. Whiteside -	1960-1968/69 Guard Duty with some Janitor Work.-Gibbsboro 1969-1978 Dump Truck, Outside Maintenance Mechanic-Gibbsboro
Alfred Dutill -	1951 - 1978 Gibbsboro Varnish Department-Four years at the most Night Janitor-Less than five years

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Night Watchman-Witness unable to estimate when he held position
Outside Maintenance-Witness unable to estimate when he held position
Security 1970-1978(Closing)

Robert Burke - 1958-1978
Bench Chemist-Chicago
Manufacturing - Resins Department-Chicago
Resin and Lacquer Superintendent-Chicago
Production Manager of the Plant-Chicago
Plant Manager - Gibbsboro (2 Years) 1973-1975
Manufacturing Manager - Cleveland

William Taylor- 1953-1978
Receiving Department-Gibbsboro
Outside Maintenance-Gibbsboro (For a few months before Plant closing)
Janitor-Gibbsboro (For a few months before Plant closing)

James Gadwood - 1966- 1978
Process Supervisor-Chicago
Varnish Supervisor-Chicago
Plant Manager - Gibbsboro 1975-1978


Robert J. Dulaney - 1964/65-1976
Plant Engineer-Gibbsboro

As discussed above, Sherwin-Williams plans to file further responses to the Supplemental Request by October 28, 1996. Sherwin-Williams needs this time, given the extensive amount of information requested and the difficulty of responding to questions requesting information which goes back many years. In the meantime, to assist Sherwin-Williams in its supplemental response, Sherwin-Williams requests EPA to provide Sherwin-Williams with information or records used as a basis for the information requests, including (1) information regarding any

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interviews with former employees and others, (2) any information used to allege Sherwin-Williams' activities at the Site and (3) information used in making requests numbered 5 to 11. Such information may help Sherwin-Williams to supplement its response.

Very truly yours,


Susanne Peticolas

SP/cew

cc: Thomas Budroe, On-Scene Coordinator
Emergency and Remedial Response Division
Removal Action Branch
U.S. EPA - Region II
2890 Woodbridge Avenue
Edison, New Jersey 08817

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
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12/1/71	12/1/72	LLOYDS & BRITISH	FUL078256
12/1/72	12/1/73	LLOYDS & BRITISH	FUL078255
12/1/72	12/1/73	LLOYDS & BRITISH	FUL078254
12/1/72	12/1/73	CONTINENTAL INS	LX1218464
12/1/72	12/1/73	LLOYDS & BRITISH	FUL078256
12/1/72	12/1/73	FIRST STATE	920168
12/1/72	12/1/73	LLOYDS & BRITISH	FUL078257
12/1/73	12/1/74	CONTINENTAL INS	11LX1218950

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
12/1/73	12/1/74	LLOYDS & BRITISH	FUL079483
12/1/73	12/1/74	LLOYDS & BRITISH	FUL079482
12/1/73	12/1/74	LLOYDS & BRITISH	FUL079484
12/1/74	12/1/75	LLOYDS & BRITISH	FUL079483
12/1/74	12/1/75	LLOYDS & BRITISH	FUL079482
12/1/74	12/1/75	LLOYDS & BRITISH	FUL079484
12/1/74	12/1/75	CONTINENTAL INS	11LX1218950
12/15/74	12/1/75	EMPLOYERS RE	PLE27464
12/15/74	12/1/75	AETNA CASUALTY	08XN78WCA
12/15/74	12/1/75	AMERICAN HOME	CE3449866
12/1/75	12/1/76	AETNA CASUALTY	08XN78WCA
12/1/75	12/1/76	EMPLOYERS RE	PLE27464
12/1/75	12/1/76	LLOYDS & BRITISH	FUL079484
12/1/75	12/1/76	CONTINENTAL INS	11LX1218950
12/1/75	12/1/76	LLOYDS & BRITISH	FUL079483
12/1/75	12/1/76	LLOYDS & BRITISH	FUL079482
12/1/75	12/1/76	AMERICAN HOME	CE3449866
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080392
12/1/76	12/1/77	CENTRAL NAT. INS.	CNZ140346
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080393
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080391
12/1/76	12/1/77	LLOYDS & BRITISH	FUL080394
12/1/77	12/1/78	CENTRAL NAT. INS.	CNZ141702
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080394
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080393
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080392
12/1/77	12/1/78	LLOYDS & BRITISH	FUL080809
12/1/78	12/1/79	LLOYDS & BRITISH	FUL080393
12/1/78	12/1/79	LLOYDS & BRITISH	FUL080394
12/1/78	12/1/79	LLOYDS & BRITISH	FUL080392
12/1/78	12/1/79	LLOYDS & BRITISH	FUL082325
12/1/78	12/1/79	AETNA CASUALTY	08XN144WCA
12/1/78	12/1/79	PINE TOP INS.	MLP100939
12/1/78	12/1/79	MIDLAND INSURANCE	XL160224
12/1/79	7/1/80	LLOYDS & BRITISH	FUL080392
12/1/79	7/1/80	COLUMBIA CASUALTY	RDX4169878
12/1/79	7/1/80	LLOYDS & BRITISH	FUL082948
12/1/79	7/1/80	LLOYDS & BRITISH	FUL080393
12/1/79	7/1/80	LLOYDS & BRITISH	FUL080394
12/1/79	7/1/80	FEDERAL INSURANCE	79356649
12/1/79	7/1/80	NORTHBROOK INS.	63006199
12/1/79	7/1/80	INTER. SURPLUS	XSI6101
12/1/79	7/1/80	AETNA CASUALTY	08XN162WCA
12/1/79	7/1/80	FIRST STATE	928134
7/1/80	7/1/81	NORTHBROOK INS.	63007209
7/1/80	7/1/81	LLOYDS & BRITISH	551UMA0391
7/1/80	7/1/81	LLOYDS & BRITISH	551UMA392
7/1/80	7/1/81	LLOYDS & BRITISH	551UMA393
7/1/80	7/1/81	AETNA CASUALTY	01XN2734WCA
7/1/80	7/1/81	FIRST STATE	930677
7/1/80	7/1/81	COLUMBIA CASUALTY	RDX4170095
7/1/80	7/1/81	INTER. SURPLUS	XSI6274
7/1/80	7/1/81	AETNA CASUALTY	01GL57447SCA

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
7/1/80	7/1/81	AETNA CASUALTY	(CN)01LG8800417S
7/1/80	7/1/81	AETNA CASUALTY	(TX)01AL314347SC
7/1/80	7/1/81	FEDERAL INSURANCE	79355022
7/1/81	7/1/82	AETNA CASUALTY	01XN3070WCA
7/1/81	7/1/82	LLOYDS & BRITISH	551UMA0391
7/1/81	7/1/82	LLOYDS & BRITISH	551UMA0392
7/1/81	7/1/82	LLOYDS & BRITISH	551UMA0307
7/1/81	7/1/82	FIRST STATE	932243
7/1/81	7/1/82	COLUMBIA CASUALTY	RDX4170235
7/1/81	7/1/82	GOVERNMENT EMPLOY	GXU30039
7/1/81	7/1/82	FEDERAL INSURANCE	79355022
7/1/81	7/1/82	MISSION INSURANCE	M877281
7/1/81	7/1/82	AETNA CASUALTY	01GL57498SCA
7/1/81	7/1/82	NORTHBROOK INS.	63008102
7/1/81	7/1/82	INTER. SURPLUS	XSI7477
7/1/82	7/1/83	GIBRALTAR CAS.	GMX01792
7/1/82	7/1/83	CIGNA-INA	ISLG0209188
7/1/82	7/1/83	LLOYDS & BRITISH	551UMA0391
7/1/82	7/1/83	LLOYDS & BRITISH	551UMA0392
7/1/82	7/1/83	TRANSIT CASUALTY	SCU956293
7/1/82	7/1/83	COLUMBIA CASUALTY	RDX9176144
7/1/82	7/1/83	INTER. SURPLUS	XSI8366
7/1/82	7/1/83	FEDERAL INSURANCE	79355022
7/1/82	7/1/83	GOVERNMENT EMPLOY	GXU30157
7/1/82	7/1/83	MISSION INSURANCE	M885832
7/1/82	7/1/83	CONTINENTAL INS	SRX1591725
7/1/82	7/1/83	INTEGRITY INS.	XL3000963
7/1/82	7/1/83	AETNA CASUALTY	01XN3432WCA
7/1/82	7/1/83	TWIN CITY FIRE	TXS101376
7/1/82	7/1/83	FIRST STATE	933271
7/1/82	7/1/83	COMMERCIAL UNION	CY9501386
7/1/83	7/1/84	FIRST STATE	934369
7/1/83	7/1/84	INTER. SURPLUS	XSI8601
7/1/83	7/1/84	LLOYDS & BRITISH	551UQA0223
7/1/83	7/1/84	GIBRALTAR CAS.	GMX02259
7/1/83	7/1/84	MIDLAND INSURANCE	XL748953
7/1/83	7/1/84	AMERICAN CENTENNI	CC015691
7/1/83	7/1/84	LLOYDS & BRITISH	551UQA0224
7/1/83	7/1/84	AETNA CASUALTY	38XN43WCA
7/1/83	7/1/84	CONTINENTAL INS	SRX1591997
7/1/83	7/1/84	TRANSIT CASUALTY	SCU956552
7/1/83	7/1/84	FIREMAN'S FUND	XLX1533898
7/1/83	7/1/84	GOVERNMENT EMPLOY	GXU30262
7/1/83	7/1/84	TWIN CITY FIRE	TXS102874
7/1/83	7/1/84	INTEGRITY INS.	XL3000656
7/1/83	7/1/84	LEXINGTON	5523503
7/1/83	7/1/84	MISSION INSURANCE	M888584
7/1/83	7/1/84	FEDERAL INSURANCE	79282213
7/1/83	7/1/84	CIGNA-INA	ISLG0209870
7/1/84	7/1/85	LLOYDS & BRITISH	551UQA0224
7/1/84	7/1/85	LLOYDS & BRITISH	551URA0138
7/1/84	7/1/85	AMERICAN CENTENNI	CC015888
7/1/84	7/1/85	LLOYDS & BRITISH	551UQA0223

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
7/1/84	7/1/85	TRANSIT CASUALTY	SCU956853
7/1/84	7/1/85	MIDLAND INSURANCE	XL770344
7/1/84	7/1/85	GIBRALTAR CAS.	GMX02675
7/1/84	7/1/85	NORTH RIVER INS.	5220362385
7/1/84	7/1/85	CIGNA-INA	ISLG0313158-0
7/1/84	7/1/85	FEDERAL INSURANCE	79282213
7/1/84	7/1/85	HARBOR INSURANCE	HI178482
7/1/84	7/1/85	LEXINGTON	5523506
7/1/84	7/1/85	INTEGRITY INS.	XL3000656
7/1/84	7/1/85	EMPLOYER'S MUTUAL	MM073592
7/1/84	7/1/85	CIGNA-INA	XCP156214
7/1/84	7/1/85	FIREMAN'S FUND	XLX1621158
7/1/84	7/1/85	MISSION INSURANCE	M890448
7/1/84	7/1/85	AETNA CASUALTY	38XN51WCA
7/1/85	7/1/86	AETNA CASUALTY	38XN59WCA
7/1/85	7/1/86	S-W RETENTION	EXF-374757
7/1/85	7/1/86	S-W RETENTION	EXF-374757
7/1/85	7/1/86	LLOYDS & BRITISH	551UQA0224
7/1/85	7/1/86	CIGNA-INA	XCPG0313469-6
7/1/85	7/1/86	LLOYDS & BRITISH	USA 0427
7/1/85	7/1/86	HOME INSURANCE	HXL-1639361
7/1/85	7/1/86	LLOYDS & BRITISH	551UQA0223
7/1/85	7/1/86	AETNA CASUALTY	38XN60WCA
7/1/85	7/1/86	MISSION INSURANCE	MN033136
7/1/85	7/1/86	CIGNA-INA	XCPG0313469-6
7/1/85	7/1/86	S-W RETENTION	NA
7/1/85	7/1/86	CIGNA-INA	ISLG0776537A
7/1/85	7/1/86	AETNA CASUALTY	38XN58WCA
7/1/86	7/1/87	LLOYDS & BRITISH	UTA0196
7/1/86	7/1/87	CIGNA-INA	ISLG0912087-7
7/1/86	7/1/87	S-W RETENTION	N/A
7/1/86	7/1/87	LLOYDS & BRITISH	UTA0195
7/1/86	7/1/87	CONSTITUTION STAT	FE111527
7/1/86	7/1/87	IL EXCHANGE	DOL-06013-E
7/1/86	7/1/87	CONSTITUTION STAT	FE121601
7/1/86	7/1/87	IL EXCHANGE	DOL-06012-E
7/1/86	7/1/87	LLOYDS & BRITISH	UTA0197
7/1/86	5/1/90	X.L.	TBD (1990)
7/1/86	7/1/87	X.L.	G159HXA
7/1/86	5/1/90	X.L.	TBD (1990)
7/1/86	5/1/89	NATIONAL UNION	4267517 (1989)
7/1/86	7/1/87	S-W RETENTION	N/A
7/1/86	7/1/87	CIGNA-INA	XLPG0912636-3
7/1/87	7/1/88	X.L.	G159HXA
7/1/87	7/1/88	CIGNA-INA	XLPG1041521-4
7/1/87	7/1/88	LLOYDS & BRITISH	UVA0248
7/1/87	7/1/88	LLOYDS & BRITISH	551UTA0195
7/1/87	7/1/88	CIGNA-INA	ISLG0358592-A
7/1/88	5/1/89	CIGNA-INA	ISLG1179109-8
7/1/88	5/1/89	LLOYDS & BRITISH	UTA0195
7/1/88	5/1/89	LLOYDS & BRITISH	UAA0239
7/1/88	5/1/89	LEXINGTON	UAA0240
7/1/88	5/1/89	X.L.	G159HXA

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
5/1/89	5/1/90	S-W RETENTION	N/A
5/1/89	5/1/90	CIGNA-INA	OGLG1278767-4
5/1/89	5/1/90	NATIONAL UNION	BE2058162
5/1/89	5/1/90	X.L.	G159HXA
5/1/90	5/1/91	FIRST STATE	FL0001902
5/1/90	5/1/91	X.L.	
5/1/90	5/1/91	X.L.	
5/1/90	5/1/91	X.L.	XLUMB-00399
5/1/90	5/1/91	PLANET (RELIANCE)	NUA149695900
5/1/90	5/1/91	S-W RETENTION	NA
5/1/90	5/1/91	NATIONAL UNION	BE3078818
5/1/90	5/1/91	CIGNA-INA	OGLG1157144-A
5/1/90	5/1/91	CAL UNION	ZCX010009
5/1/91	5/1/92	STEADFAST(ZURICH)	CE6611938-00
5/1/91	5/1/92	INS CO OF PA	46912660
5/1/91	5/1/92	CAL UNION	ZCX011255
5/1/91	5/1/92	X.L.	XLUMB-00399
5/1/91	5/1/92	FIRST STATE	FL0002545
5/1/91	5/1/92	NATIONAL UNION	BE3082932
5/1/91	5/1/92	S-W RETENTION	NA
5/1/91	5/1/92	CIGNA-INA	HDCG1157364-2
5/1/91	5/1/92	CIGNA-INA	XCPG11573770
5/1/91	5/1/92	FEDERAL INSURANCE	7909-04-97
5/1/91	5/1/92	X.L.	
5/1/91	5/1/92	PLANET (RELIANCE)	NUA149695901
5/1/92	5/1/93	Cal Union	ZCX 02 00 51
5/1/92	5/1/93	X.L.	XLUMB-00399
5/1/92	5/1/93	American Excess Ins Assoc	HN000055892
5/1/92	5/1/93	Federal Insurance	(93) 7909-04-97
5/1/92	5/1/93	Agricultural (Great American)	EXC 7-30-61-03-00
5/1/92	5/1/93	Ins Co of Pa	4692-3035
5/1/92	5/1/93	International (Crum & Forster)	531-205506-9
5/1/92	5/1/93	First State	FL 0003197
5/1/92	5/1/93	National Union	BE 308 61 63
5/1/92	5/1/93	Cigna-INA	HDC G1 402709-9
5/1/92	5/1/93	Planet (Reliance)	NEA 1496959
5/1/93	5/1/94	Nutmeg (Hartford)	YA0000049
5/1/93	5/1/94	X.L.	XLUMB-00399
5/1/93	5/1/94	Cigna-INA	HDC G1 402709-9
5/1/93	5/1/95	National Union	BE 309 12 03
5/1/93	5/1/94	Agricultural (Great American)	EXC 730-61-03
5/1/93	5/1/94	International (Crum & Forster)	531-206480-7
5/1/93	5/1/94	Royal	HA 006489
5/1/93	5/1/94	Planet (Reliance)	NEA 1496959
5/1/93	5/1/94	Federal Insurance	(94) 7909-04-97
5/1/93	5/1/94	Ins Co of Pa	4693-3607
5/1/93	5/1/94	American Excess Ins Assoc	HR000067693
5/1/93	5/1/94	National Surety (Fireman's Fund)	XXK-000-3180-711
5/1/94	5/1/95	Cigna-INA	HDC G1 658663-8
5/1/94	5/1/96	National Union	BE 309 12 03
5/1/94	5/1/95	X.L.	XLUMB-00399
5/1/94	5/1/95	American Excess Ins Assoc	HR000079294
5/1/94	5/1/95	National Surety (Fireman's Fund)	XXK-0008212-934

POL EFFECT DATE	POL EXPIR DATE	INSURER	POLICY NUMBER
5/1/94	5/1/95	Federal Insurance	(95) 7909-04-97
5/1/94	5/1/95	Royal	HA 007760
5/1/94	5/1/95	Ins Co of Pa	4694-3676
5/1/94	5/1/95	Reliance National Indemnity	NEA 1496959
5/1/94	5/1/95	Gulf Insurance Co	GA 5654051
5/1/94	5/1/95	Agricultural (Great American)	EXC 763-64-60



DIRECTORS, OFFICERS, MANAGERS

BOARD OF DIRECTORS

James M. Biggar, 66
Chairman and Chief Executive Officer
Glencair Corporation

John G. Breen, 60
Chairman and Chief Executive Officer
The Sherwin-Williams Company

Leigh Carter, 69*
Retired, former President and
Chief Operating Officer
B.F. Goodrich Company

Thomas A. Commes, 52
President and Chief Operating Officer
The Sherwin-Williams Company

Daniel E. Evans, 58*
Chairman, Chief Executive Officer
and Secretary
Bob Evans Farms, Inc.

Robert W. Mahoney, 58
Chairman, Chief Executive Officer
and President
Diebold, Incorporated

William G. Mitchell, 64*
Retired, former Vice Chairman
Centel Corporation

A. Malachi Mixon, III, 54
Chairman, President and
Chief Executive Officer
Invacare Corporation

Helen O. Petrauskas, 50*
Vice President, Environmental and
Safety Engineering
Ford Motor Company

Ralph E. Schey, 70
Chairman and Chief Executive Officer
The Scott & Fetzer Company

Richard K. Smucker, 46*
President
The J. M. Smucker Company

** Audit Committee Member*

*** Executive Officers as defined by the Securities Exchange Act of 1934.*

CORPORATE OFFICERS

John G. Breen, 60**
Chairman and Chief Executive Officer

Thomas A. Commes, 52**
President and Chief Operating Officer

Larry J. Pitorak, 48**
Senior Vice President-Finance,
Treasurer and Chief Financial Officer

John L. Ault, 49**
Vice President-
Corporate Controller

Conway G. Ivy, 53**
Vice President-
Corporate Planning and Development

Robert E. Kinney, 59
Vice President-
Administration

Thomas Kroeger, 46**
Vice President-
Human Resources

Louis E. Stellato, 44**
Vice President, General
Counsel and Secretary

James J. Sgambellone, 37
Assistant Secretary and
Corporate Director of Taxes

OPERATING MANAGERS

Frank E. Butler, 59**
President & General Manager,
Coatings Division

Christopher M. Connor, 38**
President & General Manager,
Specialty Division

Thomas M. Coy, 36
President & General Manager,
Transportation Services Division

T. Scott King, 42**
President & General Manager,
Consumer Brands Division

Blair P. LaCour, 48
President & General Manager,
Mid Western Division,
Paint Stores Group

John C. Macatee, 43**
President,
Paint Stores Group

Steven J. Oberfeld, 42
President & General Manager,
South Western Division,
Paint Stores Group

James E. Renshaw, 47
President & General Manager,
Eastern Division,
Paint Stores Group

Salvatore V. Sanzone, 59
President & General Manager,
Southeastern Division,
Paint Stores Group

Joseph M. Scaminace, 41**
President & General Manager,
Automotive Division